

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FÖRSTA AP-FONDEN AND DANSKE
INVEST MANAGEMENT A/S,
Individually and on Behalf of All Others
Similarly Situated,

Civil No. 12-3070 (JNE/HB)

CLASS ACTION

Plaintiffs,

v.

ST. JUDE MEDICAL, INC., DANIEL J.
STARKS, JOHN C. HEINMILLER, ERIC
S. FAIN, MICHAEL T. ROUSSEAU, and
DONALD J. ZURBAY,

Defendants.

**CLASS REPRESENTATIVES' MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

Pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Settlement and Settlement Notice Procedures dated July 13, 2016, Class Representatives Första AP-fonden and Danske Invest Management A/S, on behalf of themselves and members of the Court-certified Class, respectfully move this Court for entry of an Order and Final Judgment approving the proposed Settlement of the above-captioned action as fair, reasonable and adequate and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable.

This motion is based on the supporting memorandum of law, the Declaration of Gregg S. Levin and Gregory M. Castaldo in Support of Class Representatives' Motion for Final Approval of Settlement and Plan of Allocation and Class Counsel's Motion for Attorneys' Fees, Reimbursement of Litigation Expenses, and Reimbursement of Class Representatives' Costs and Expenses and supporting exhibits, the papers and filings on record in this matter, and such additional evidence or argument as may be presented by the parties at the hearing of this motion.

Proposed orders will be submitted with Class Representatives' reply submission on or before October 31, 2016, after the deadlines for objecting and opting back into the Class have passed.

Dated: October 5, 2016

Respectfully submitted,

s/ James W. Anderson
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